



Order Filed on March 30, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

833099
PHELAN HALLINAN DIAMOND & JONES, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500
Attorneys for Secured Creditor: FREEDOM
MORTGAGE CORPORATION

In Re:

Kevin Michael O'Connor

Case No: 19-31145 - CMG

Hearing Date: 03/04/2020

Judge: Christine M. Gravelle

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION

The consent order set forth on the following pages, numbered two (2) and three (3) is hereby **ORDERED**.

DATED: March 30, 2020



Honorable Christine M. Gravelle
United States Bankruptcy Judge

NJID 833099

PHELAN HALLINAN DIAMOND & JONES, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500

Attorneys for FREEDOM MORTGAGE CORPORATION

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE:

Kevin Michael O'Connor

Case No. 19-31145 - Cmg

Chapter 13

Debtor

Consent Order Resolving
Objection To Confirmation

Hearing Date: 03/04/2020

This Consent Order pertains to the property located at 115 Hawthorne Street, Neptune, NJ 07753, mortgage account ending with "1706";

THIS MATTER having been brought before the Court by William H. Oliver, Jr., Esquire attorney for debtor, KEVIN MICHAEL O'CONNOR, upon the filing of a Chapter 13 Plan, FREEDOM MORTGAGE CORPORATION by and through its attorneys, Phelan Hallinan Diamond & Jones, PC having filed an Objection to the Confirmation of said Chapter 13 Plan and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for other and good cause shown:

IT IS ORDERED as follows:

1. Freedom Mortgage Corporation has filed a valid, secured Proof of Claim in the amount of \$34,193.98.
2. The Trustee is authorized to disburse on the secured arrearage claim of Freedom Mortgage Corporation in the amount of \$34,193.98 (Claim 2-1) pending Debtor potentially completing a loan modification. Should the debtor qualify for a loan modification, the loan modification must be approved no later than **May 6, 2020**
3. If Loan Modification is approved, Freedom Mortgage Corporation shall file an Amended Proof of Claim showing the amount of arrears paid to date by the Trustee.

4. If a loan modification is not approved by **May 6, 2020**, the debtor shall do one of the following: 1) file a Modified Plan to cure the arrearage claim of Movant; or 2) file a Modified Plan to surrender the property subject to said claim; or 3) a Notice to Convert to Chapter 7; or 4) a Notice to Dismiss Case.

5. Debtor shall tender adequate protection payments to Freedom Mortgage Corporation as required by the Loss Mitigation Program (LMP). The adequate protection payments will continue only while the Debtor is in LMP. The Loss Mitigation Program is scheduled to terminate on **May 6, 2020**. If the Debtor fails to make adequate protection payments, Freedom Mortgage Corporation will file an Application for Early Termination of LMP. Once the Loss Mitigation Program terminates on **May 6, 2020**, or an earlier date confirmed by the court, the Debtor shall cease tendering the reduced adequate protection payments and begin making regular monthly mortgage payments to Freedom Mortgage Corporation as required by the mortgage and note.

6. This Consent Order shall be incorporated in and become a part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,
Content and entry of the within Order:

PHELAN HALLINAN DIAMOND & JONES, PC
Attorneys for Secured Creditor:
FREEDOM MORTGAGE CORPORATION

/s/ Robert J. Davidow
Robert J. Davidow, Esq.
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Dated: 3/19/2020

/s/ William H. Oliver Jr.
William H. Oliver, Jr., Esquire
Attorney for Debtor

Dated: 3/19/2020